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U.S. DEPARTMENT OF COMMERCE
FEDERAL MARITIME COMMISSION

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October 1, 2003

Honorable Bryant L. Van Brakle
Secretary
Federal Maritime Commission
800 North Capitol Street, N.W.
Washington, D.C. 20573

RE: Petition of National Customs Brokers and Forwarders
Association of America, Inc. for a Limited Exemption From
Certain Tariff Requirements of the Shipping Act of 1984

Petition No: P5-03

Dear Secretary Van Brakle:

My name is John Dauernheim, Chief Operating Officer of Oregon International Air Freight Co., d.b.a. OIA Global Logistics. OIA Global Logistics is an air and ocean freight forwarder and Customhouse broker offering full logistics services. Our OTI license number is 3760 NF. We have 7 offices in the U.S. and 9 offices in Asia. We also utilize over 100 agents globally. We consider ourselves a small to medium sized company, as our annual revenues do not exceed \$100 million/year.

Rate filings and tariff maintenance have proven to be a hindrance to our organization by the time, effort and costs incurred as a result. Details are as follows:

- ◆ The annual cost of subscribing to a tariff publishing service: \$400.00/year
- ◆ The annual cost to access all tariffs maintained by our publishing service: \$1,200.00/year
- ◆ The approximate number of hours and costs spent each year in maintaining the tariff website or making changes to tariff:
 - 42 hours per month, or approximate labor costs: \$10,200.00/year
 - Cost to file rates or make changes to our tariff: \$7,200.00/year
- ◆ When quoting rates, labor costs spent in ensuring an existing rate is not already on file:
\$1,000.00/year

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- ◆ Our company is able to track the number of times shippers or other persons have accessed our tariff by contacting our filing service directly. There have only been 9 inquiries from outside parties from the year 2001 to date. The cost and time to subscribe and maintain our tariff far outweighs the requirement of accessibility.
- ◆ In addition, NVOCC's are vulnerable to the surcharges imposed by the carriers. Carriers are not always diligent in advising their NVOCC clients 30 days prior to the implementation of a surcharge or an increase to an existing one. As a result, there may be a few days lag time before the NVO is made aware of this. Due to the 30 day filing requirement, the NVO may be forced to absorb the additional charges if they do not file the increase on the same day the carriers file.

OIA Global Logistics supports the position held by the NCBFFA with regards to exemption from certain tariff requirements. OIA maintains a relatively small tariff. Very seldom do we have multiple shippers moving the same commodity on a specific lane segment. Therefore, most rates are negotiated with shippers on an individual basis. Rate tariffs are not useful to OIA or our customers because shippers don't access or rely on NVOCC rate tariffs.

I, John Dauernheim declare under penalty of perjury that the foregoing is true and correct. Further I certify that I am qualified and authorized to file this verified statement.

Executed on October 1, 2003.

A handwritten signature in black ink, appearing to read "John Dauernheim".

John Dauernheim
Chief Operating Officer